

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jiangsu Huari Webbing
Leather Co., Ltd.

Plaintiff

v.

Joes Identified in
Schedule “A”

Defendants.

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Case No. 23-cv-2605

DECLARATION OF STEVEN R. FAIRCHILD

I, Steven R. Fairchild, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am counsel for Plaintiff, Jiangsu Huari Webbing Leather Co. Ltd (“Huairi”) in this action. As such, I have personal knowledge about the issues relevant to this action and motion.
2. I personally reviewed the product listings for all named defendants with an eye towards the patent claims.
3. The initial number of potential defendant sellers was over 200.
4. We narrowed the number down to 162.
5. When I reviewed the product listing for Hyponix, I believed that the product was a single piece, and not separate pieces. The individual colors of the respective components appeared to be one piece.
6. Accordingly, I believed that Hyponox’s product was similar to many other products of the other defendant sellers. With this structure in mind, I believed that it would infringe the patent’s claim, either literally or under the doctrine of equivalents.

7. When I reviewed the product listing for NinjaSafe, it seemed identical to many other products of the other defendant sellers. I believed that it would infringe the patent's claim, either literally or under the doctrine of equivalents.
8. I had no idea that Amazon would cease the entire account for Hyponix, NinjaSafe or any other defendant.
9. I believed that the respective defendant Amazon accounts would be frozen only as to the scope of the Order, which was to cease the sale of product and no further.
10. I was very surprised to learn that the entire accounts were frozen.

I declare under penalty and perjury of the United States of America, that the foregoing statements and facts are true and correct.

Executed on May 15, 2023

/S/Steven R. Fairchild

Steven R. Fairchild